

DEPARTMENT OF THE ARMY

DESERET CHEMICAL DEPOT 11500 Stark Road STOCKTON, UT 84071-0250

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UTAH DIVISION OF SOLID & HAZARDOUS WASTE 08.00434

January 30, 2008

Director of Risk Management

SUBJECT: Class 2 Modification to CAMDS Permit Module II & Attachment 16 – Request to Change the Monitoring Requirements for Off-line HVAC stack NRTs. Deseret Chemical Depot, EPA I.D. Number UT5210090002.

Mr. Dennis Downs
Executive Secretary
Attn: Ms. Michelle Weis
Department of Environmental Quality
Division of Solid and Hazardous Waste
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Dear Mr. Downs:

DCD submits the following Class 2 Modification to the CAMDS Part B Permit [in accordance with 40 CFR 270.42(b) and 270.42, Appendix I, A.4.b.] to change the requirement for pulling DAAMS tubes when HVAC stack NRTs are off-line (Module II, Condition II.N.5 and Attachment 16, paragraph 10.1).

The current requirement is for co-located DAAMS tubes to be pulled and analyzed if the HVAC stack NRT is off-line for more than 5 cycles. DCD is proposing to change this requirement such that the NRT can be off-line for up to 10 instrument cycles before the DAAMS are pulled. The current requirement is over-burdensome for monitoring operators because it doesn't allow time to complete a calibration or perform other needed routine equipment maintenance (such as PCT change-out). Proposed changes to the permit sections are enclosed.

If you have any questions regarding this modification, please contact Mr. D. Troy Johnson (435) 833-4198.

Sincerely,

Frederick D. Pellissier Colonel, Chemical Corp.

Commanding

*CERTIFICATION STATEMENT

Enclosure